



Qwest
607 14th Street NW, Suite 950
Washington, DC 20005
Phone: 202.429.3121
Fax: 202.293.0561

Cronan O'Connell
Vice President-Federal Regulatory

EX PARTE

Electronic Filing via ECFS

April 11, 2005

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Room TW B-204
Washington, DC 20554

RE: *In the Matter of IP-Enabled Services*, WC Docket No. 04-36

Dear Ms. Dortch:

Qwest requests that the attached letter be filed on the record in the above-captioned proceeding. If you have any questions regarding this submission, please contact the undersigned at the contact information reflected in the letterhead.

This *ex parte* presentation is being filed electronically via the Commission's Electronic Comment Filing System pursuant to Commission Rule 47 C.F.R. § 1.1206(b)(1).

Sincerely,
/s/ Cronan O'Connell

Attachment

Copy to:
Michelle Carey (michelle.carey@fcc.gov)
Tom Navin (thomas.navin@fcc.gov)
Julie Veach (julie.veach@fcc.gov)
Terri Natoli (terri.natoli@fcc.gov)



April 11, 2005

James C. Carroll
Product Manager
600 Stinson Blvd. 3N
Minneapolis, MN 55413
(612) 664-4905

Mr. Jeffrey A. Citron
Chairman and CEO
Vonage Holding Corporation
214 Route 27
Edison, NJ 08817

Dear Mr. Citron,

I am responding to your letter of February 17, 2005 to Richard C. Notebaert, Qwest Chairman and CEO, where you requested that Qwest collaborate with Vonage in making E-911 services available to Vonage's VoIP subscribers. Qwest is pleased that it currently makes E-911 services available to VoIP service providers and their subscribers, using a secure and reliable solution based on national industry standards that is consistent with public safety needs.

The trial with King County, Washington, that you refer to in your letter included an *exploratory* implementation of Automatic Location Information (ALI) messaging standards to deliver the calling party's location in near real time. The resulting data validated that the ALI/messaging portion of the NENA (National Emergency Numbering Association) VoIP/911 I2 Phase standard can be successfully achieved. The King County trial also evaluated *experimental* non-standard access by VoIP providers to Qwest's Selective Router (SR). The conclusion reached after studying the trial data is that this non-standard approach is problematic and cannot be deemed a success. This experimental approach was discussed at the recent NENA Technical Development Committee (TDC) conference. To date, neither NENA nor any emergency services standards body has approved of this non-standard access method. Thus, Qwest does not consider the trial overall to provide a solid technical foundation on which to base a broad deployment.

We both recognize that consumer protection and public safety is the key objective. Any non-standard access method that does not ensure this objective is, needless to say, unacceptable by all reasonable stakeholders in public safety and the telecom industry. Using proven dedicated connectivity, consistent with the NENA VoIP/911 I2 Phase standards, various service providers today take advantage of the

secure and reliable solution to connect to the Qwest SRs and the Public Safety Answering Points (PSAPs) that we serve. Vonage may rapidly deploy E-911 using a combination of the ALI messaging demonstrated in King County along with the proven dedicated SR connectivity that Qwest offers. This will put us both on a solid path toward the nationally recognized NENA VoIP/911 I2 Phase solution.

Qwest is committed to work with Vonage and other VoIP service providers to identify and support a nationally agreed-upon VoIP E-911 solution. Please have someone in your Company contact me at your earliest convenience so that we can begin working together on a deployment schedule tailored to your service areas.

Sincerely,

James C. Carroll

Public Safety Product Manager
Qwest Services Corporation

cc:

Cronan O'Connell, Qwest Vice President Federal Regulatory
Gregory S. Ballentine, President APCO International
Marlys Davis, King County WA